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22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 SAN FRANCISCO DIVISION

25 In re FACEBOOK BIOMETRIC)
26 INFORMATION PRIVACY LITIGATION)

27 This Document Relates To:)

28 ALL ACTIONS.)

Master File No. 3:15-cv-03747-JD

PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER
SEAL PURSUANT TO CIVIL LOCAL
RULES 7-11 AND 79-5

Pursuant to Civil Local Rules 7-11 and 79-5 and the Order granting the Stipulated Protective Order (Dkt. No. 88) ("Protective Order"), Plaintiffs in the above-captioned case respectfully move for leave to file under seal an unredacted version of their Motion for Class Certification as well as 23 documents attached as exhibits thereto. Pursuant to Civil Local Rule 79-5(d)(1)(A) and (e), Plaintiffs submit redacted and unredacted copies of the Motion, as well as unredacted copies of 23 exhibits thereto, which plaintiffs seek to seal in their entirety. Plaintiffs also submit the declaration of Rafey Balabanian in support of the instant motion.

Plaintiffs take no position on the propriety of sealing these documents or redacting the motion. The documents were designated "Confidential" or "Highly Confidential" by Defendant pursuant to the Protective Order, and the redactions all relate to the designated documents.

Consistent with Civil Local Rule 79-5(e), within four days of the filing of Plaintiffs' Administrative Motion to File Under Seal, the designating party must file with the Court and serve declarations supporting the request to seal the protected material and must lodge and serve a narrowly tailored proposed sealing order, or the information at issue will be made part of the public record. Counsel for Defendant has conferred with counsel for Plaintiffs regarding a stipulated extension to this deadline, and Plaintiffs anticipate that such a stipulation will be forthcoming.

For the foregoing reasons, Plaintiffs request leave to file under seal the unredacted version of the attached Motion and 23 exhibits thereto.

DATED: December 8, 2017

s/ Rafey S. Balabanian
 RAFEY S. BALABANIAN

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CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses for all counsel of record in the referenced action.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 8, 2017, at San Francisco, California.

s/ Rafev S. Balabanian
RAFEY S. BALABANIAN